

1 KEVIN V. RYAN (CASBN 118321)
2 United States Attorney
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 UNITED STATES OF AMERICA,)	No. CR
13 Plaintiff,)	
14 v.)	VIOLATIONS: 18 U.S.C. § 1344(1) –
15 LAURENCE SEIDENFELD,)	Bank Fraud
16 Defendant.)	OAKLAND VENUE

17
18 INDICTMENT

19 The Grand Jury charges:

20 **COUNTS ONE to FOUR:** (18 U.S.C. § 1344(1) – Bank Fraud)

21 1. Beginning on a date unknown and continuing to December 10, 2004, in the
22 Northern District of California and elsewhere, the defendant
23 LAURENCE SEIDENFELD,
24 did knowingly execute, and attempt to execute, a scheme to defraud the financial
25 institutions listed below, the deposits of which were then insured by the Federal Deposit
26 Insurance Corporation, by stealing money and property of said financial institution, in the
27 approximate amounts and in the approximate time periods described below in Counts One
28 through Four, by obtaining and causing others to obtain loans based on fraudulent loan
documents and by double selling loans without the knowledge of the financial

INDICTMENT
CR

institutions, all in violation of Title 18, United States Code, Section 1344(1):

<u>Count</u>	<u>Dates</u>	<u>Financial Institution</u>	<u>Amount of Fraudulent Loans</u>
1	6/30/04 - 10/14/04	Gateway	\$6,272,860
2	7/03 - 7/04	Aurora Loan Services, Inc.	\$1,740,000
3	7/04 - 10/04	First Collateral	\$2,684,905
4	4/26/04 - 8/30/04	First Horizon Home Loan Corp.	\$2,341,438

COUNT FIVE: (18 U.S.C. § 982(a)(2)(A) – Forfeiture)

As a result of said offenses alleged in the Scheme in Counts One - Five above,
defendant

LAURENCE SEIDENFELD,

shall forfeit to the United States the sum of \$13,039,203, which is property that
constitutes and is derived from proceeds obtained as a result of said offenses, pursuant to
Title 18, United States Code, Section 982(a)(2)(A).

Sentencing Factors

1. The offenses charged in Counts One through Four resulted in losses exceeding
\$7,000,000.

2. The commission of the offenses charged in Counts One through Four, involved 10
or more victims.

3. The commission of the offenses charged in Counts One through Four, involved
“sophisticated means.” “Sophisticated means” means especially complex or especially
intricate offense conduct pertaining to the execution or concealment of an offense.

4. Defendant LAURENCE SEIDENFELD derived more than \$1,000,000 in gross
receipts from one or more financial institutions as a result of the offenses charged in
Counts One through Four.

1 5. During the commission of the offenses charged in Counts One through Four, the
2 defendant LAURENCE SEIDENFELD abused a position of public or private trust, or
3 used a special skill, in a manner that significantly facilitated the commission or
4 concealment of the offense.

5 6. During the commission of the offenses charged in Counts One through Four,
6 defendant LAURENCE SEIDENFELD was on supervised release.

7 Dated:

A TRUE BILL.

8
9 FOREPERSON

10 KEVIN V. RYAN
11 United States Attorney

12 J. DOUGLAS WILSON
13 Acting Chief, Oakland Branch

14 (Approved as to form: AUSA BESSETTE)
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